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Attorneys for Defendant
PACIFIC GATEWAY CONCESSIONS LLC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

RACHEL HOCHSTETLER,
CIRENA TORRES,
Plaintiffs,
vs.
PACIFIC GATEWAY CONCESSIONS LLC, et
al.,
Defendants.

) CASE NO. 3:14-CV-04748-TEH
)
) **STIPULATION AND ~~PROPOSED~~**
) **ORDER CONTINUING INITIAL CASE**
) **MANAGEMENT CONFERENCE**

PACIFIC GATEWAY CONCESSIONS LLC, et
al.,
Defendants.

) Date: April 13, 2015
) Time: 1:30 p.m.
) Courtroom: 12

PACIFIC GATEWAY CONCESSIONS LLC, et
al.,

Cross-Claimant,
vs.

POINT SOLUTIONS, LLC,

Cross-Defendant.

STIPULATION

Plaintiffs Rachel Hochstetler and Cirena Torres, Defendant and Cross-Claimant Pacific Gateway Concessions LLC ("PGC"), and Cross-Defendant Point Solutions, LLC ("PS") hereby stipulate as follows:

Recitals

1. The Initial Case Management Conference in this action was originally scheduled for February 2, 2015, per the Clerk's Notice Scheduling Case Management Conference on Reassignment (Docket 12), then continued until April 13, 2015 since PS had not yet appeared in the action (Docket 24).

2. On April 1, 2015, the parties participated in a mediation before court-appointed mediator David Bluhm. As a result of the mediation, Plaintiffs and PGC reached a tentative settlement of the class action by agreeing to a settlement fund for putative class members. Plaintiffs and PGC are presently discussing payment of attorney fees and costs to Plaintiffs' counsel if counsel is appointed class counsel and payment of an incentive award to the Plaintiffs if they are appointed class representatives. If Plaintiffs and PGC are able to reach agreement on all settlement terms, they intend to seek preliminary approval of the class settlement from the Court. PGC and PS also engaged in settlement negotiations during the mediation, which are still ongoing.

3. In the interest of efficient case management and minimizing the burden of the action on the Court's resources, the parties agree that the Initial Case Management Conference should be continued from April 13, 2015 for 60 days in order to permit settlement discussions to conclude.

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Stipulation

4. Based on the foregoing recitals, the parties stipulate that the Initial Case Management Conference of April 13, 2015 should be continued for 60 days in order to permit settlement discussions to conclude.

So Stipulated.

Dated: April 2, 2015

CHANT & COMPANY,
A Professional Law Corporation

By: /s/ Chant Yedalian
CHANT YEDALIAN
Attorneys for Plaintiffs
RACHEL HOCHSTETLER and CIRENA
TORRES

Dated: April 2, 2015

ROSALES LAW PARTNERS LLP

By: /s/ Robert D. Sanford
ROBERT D. SANFORD
Attorney for Defendant and Cross-Claimant
PACIFIC GATEWAY CONCESSIONS
LLC

Dated: April 2, 2015
LLP

HUDDLESTON & SIPOS LAW GROUP

By: /s/ Robert A. Huddleston
ROBERT A. HUDDLESTON
Attorney for Cross- Defendant
POINT SOLUTIONS, LLC

ORDER

Pursuant to stipulation, it is so ordered. The Initial Case Management Conference shall occur on June 15, 2015 at 1:30 pm in Courtroom 12 on the 19th floor, United States District Courthouse, 450 Golden Gate Avenue, San Francisco, CA 94102. Not less than seven days prior, counsel shall submit a joint case management conference statement, and all other deadlines are continued according to the new date of the Initial Case Management Conference.

Dated: April 6, 2015

